

21 July 2016

Mr M Dunne
Ministry for Primary Industries
PO Box 10420
Wellington

Dear Sir

Comments on “Developing a Cost Recovery Framework for the Ministry for Primary Industries”
Discussion Document 2016/07

1. MPI has invited submissions on its discussion document “*Developing a Cost Recovery Framework for the Ministry for Primary Industries*” Discussion Document 2016/07. The discussion document is the output of Stage 1 of the First Principles Review. A more detailed review of the existing charges, based on the principles established in Stage 1, will be undertaken in Stage 2 later in 2016.
2. Fisheries Inshore New Zealand Limited (FINZ) represents the inshore finfish, pelagic and tuna fisheries of New Zealand. It was formed in November 2012 as part of the restructuring of industry organisations. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). As part of that work it also works collaboratively with other industry organisations and Sector Representative Entities (SREs), Seafood New Zealand, Ministry for Primary Industries (MPI) and the Department of Conservation.
3. FINZ supports and endorses the submission presented by Seafood New Zealand on this matter. We support their submissions that:
 - a. The First Principles Review primarily seeks to preserve the “status quo” within an administratively easy regime rather than constitutes a comprehensive principled review of MPI cost recovery;
 - b. The discussion document is not of satisfactory quality and does not appropriately or properly inform stakeholders on the proposed principles, policies and practices contained in the document;
 - c. The engagement programme undertaken for the preparation of the discussion document was inadequate, particularly in respect with the seafood sector;
 - d. The discussion document should be withdrawn, MPI should provide the appropriate information as set out in the Appendix to the SNZ submission and then re-engage with the primary sectors;
 - e. The cost recovery principles as contained in the Fisheries Act 1996 should not be amended;
 - f. The cost recovery rules must be reviewed to be appropriate, to be consistent with the legislated principles and to be legally valid.

4. Given the fundamental deficiencies in the review process, the discussion document and the engagement process, we consider it would be premature if the Ministry sought any approvals from the Minister at this time in respect of the principles, policies or practices for MPI cost recovery. If the Ministry determines to seek any such approvals from the Minister, we would appreciate early advice of that decision in order for FINZ to directly communicate its views to the Minister.
5. We look forward to a meaningful engagement with MPI on the cost recovery of fisheries and conservation activities.

Sincerely

A handwritten signature in black ink, appearing to read 'J. Helson', with a long horizontal flourish extending to the right.

Jeremy Helson
Fisheries Inshore New Zealand